

EXHIBIT A

FEIN, SUCH & CRANE, LLP

Attorneys At Law

Northern New York Partner
Relin, Goldstein & Crane, LLP
28 East Main Street, Suite 1800
Rochester, New York 14614
585-232-7400
Fax 585-756-5202

SERVICE BY FACSIMILE NOT ACCEPTED

March 28, 2014

Richard Croak
314 Great Oaks Blvd
Albany, NY 12203

Re: Santander Bank, N.A. v. Raymond S. Elwood
Case # 13-11700

Dear Mr. Croak:

This letter is written to advise you that the debtor is past the ninety (90) day default period as to post petition payments per the terms of the Confirmation Order entered on December 2, 2013. The debtor is due and owing for post petition payments for August 2013 through March 2014 in the amount of \$5,941.20. The bank must receive these payments, in certified funds, within fifteen (15) days from the date of this letter or it will have no choice but to pursue relief from the automatic stay. Please be advised that partial funds will not be accepted.

Should you have any questions with regard to the above please do not hesitate to contact the office.

Very truly yours
FEIN, SUCH & CRANE, LLP



Adam M. Nagel
Bankruptcy Paralegal

cc: Raymond S. Elwood
Andrea E. Celli
Office of the U.S. Trustee

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

IN RE:

Raymond S. Elwood

Debtor.

Chapter: 13

Case 13-11700 rel

CERTIFICATE OF SERVICE

STATE OF NEW YORK)
COUNTY OF MONROE)

I, Adam M. Nagel, being duly sworn, deposes and says:

I am not a party to the action, am over 18 years of age, and reside at Rochester, New York.

On March 28, 2014, I served a copy of the within Notice of Default by mailing the same in a sealed envelope, with postage prepaid thereon, in a post office or depository of the United States Postal Service within the State of New York, addressed to the last known addresses as indicated below.


Richard Croak
314 Great Oaks Blvd
Albany, NY 12203

Raymond S Elwood
3444 Gari Lane
Schenectady, NY 12303

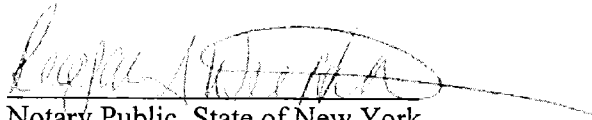
Andrea E. Celli-Trustee
Chapter 13 Standing Trustee
7 Southwoods Boulevard
Albany, NY 12211

U.S. Trustee
Office of the U.S. Trustee
74 Chapel Street, Suite 200
Albany, NY 12207

FEIN, SUCH & CRANE, LLP
Attorneys for Movant

By: 
Adam M. Nagel,
Bankruptcy Paralegal
28 EAST MAIN STREET, SUITE 1800
ROCHESTER, NY 14614
585/232-7400

Sworn to before me this 28th day of
March, 2014


Notary Public, State of New York
Qualified in Monroe County

REAGAN A. WEINHART
Notary Public, State of New York
Qualified in Monroe County
No. 01WE6041384
Commission Expires May 8, 2017

EXHIBIT B

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

In re

RAYMOND S. ELWOOD

Debtor.

CASE NO. 13-11700 rel
Chapter 13
EX-PARTE APPLICATION

TO THE HONORABLE, ROBERT E. LITTLEFIELD, JR., BANKRUPTCY JUDGE OF THE
NORTHERN DISTRICT OF NEW YORK:


The ex-parte application, by FEIN, SUCH & CRANE, LLP, respectfully represents:

(1) That on December 2, 2013, this court entered an Order Confirming Plan with respect to the above-mentioned debtor.

(2) Under the terms of Order Confirming Plan, if the debtor is post petition delinquent over ninety (90) days, post confirmation, the automatic stay shall be modified to allow Applicant, Santander Bank, N.A., to foreclose on real property known as 3444 Gari Lane, Schenectady, NY 12303, and now or formerly owned by Debtor and co-Debtors, Amanda Elwood f/k/a Amanda Mitchell, and Martha A. Elwood, upon fifteen (15) day notice of default and if not cured, submission of an Ex-Parte Order.

(3) Applicant respectfully requests that the Court grant this Ex-Parte Application and lift the automatic stay and co-debtor stays to permit Applicant to foreclose on the said real property.

Dated: April 21, 2014



Mark K. Broyles, Esq.
Fein, Such & Crane, LLP
Attorney for Applicant
28 East Main Street, Suite 1800
Rochester, NY 14614

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

In re

RAYMOND S. ELWOOD

Debtor.

CASE NO. 13-11700 rel

Chapter 13

EX-PARTE ORDER

GRANTING RELIEF FROM

THE AUTOMATIC STAY

Per the terms of the Order Confirming Plan dated December 2, 2013, by the Hon. Robert E. Littlefield, Jr., and this Order submitted by Fein, Such & Crane, LLP, attorneys for Applicant, Santander Bank, N.A., it is now

ORDERED, that the automatic stay and co-debtor stay shall be modified to allow Applicant to foreclose on real property known as 3444 Gari Lane, Schenectady, NY 12303.

ORDERED, that the Applicant notify the trustee, Andrea E. Celli, Esq., and the debtor of surplus monies, if any, arising from said sale of the Collateral.

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

IN RE:

Raymond S. Elwood

Debtor.

Chapter: 13

Case 13-11700 rel

CERTIFICATE OF SERVICE

STATE OF NEW YORK)
COUNTY OF MONROE)

I, Adam M. Nagel, being duly sworn, deposes and says:

I am not a party to the action, am over 18 years of age, and reside at Rochester, New York.

On April 21, 2014, I served a copy of the within Ex Parte Application by mailing the same in a sealed envelope, with postage prepaid thereon, in a post office or depository of the United States Postal Service within the State of New York, addressed to the last known addresses as indicated below.

Richard Croak
314 Great Oaks Blvd
Albany, NY 12203

Raymond S Elwood
3444 Gari Lane
Schenectady, NY 12303

Amanda Elwood f/k/a Amanda Mitchell
3444 Gari Lane
Schenectady, NY 12303

Martha A. Elwood
3444 Gari Lane
Schenectady, NY 12303

Andrea E. Celli-Trustee
Chapter 13 Standing Trustee
7 Southwoods Boulevard
Albany, NY 12211

U.S. Trustee
Office of the U.S. Trustee
74 Chapel Street, Suite 200
Albany, NY 12207

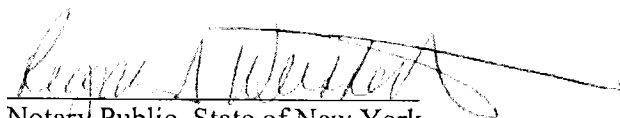
FEIN, SUCH & CRANE, LLP
Attorneys for Movant

By:



Adam M. Nagel,
Bankruptcy Paralegal
28 EAST MAIN STREET, SUITE 1800
ROCHESTER, NY 14614
585/232-7400

Sworn to before me this 21st day of
April, 2014



Notary Public, State of New York
Qualified in Monroe County

REAGAN A. WEINHART
Notary Public, State of New York
Qualified in Monroe County
No. 01WE6041364
Commission Expires May 8, 2017

EXHIBIT C



Robert E. Littlefield, Jr.
Chief, United States Bankruptcy Judge

So Ordered.

Signed this 21 day of April, 2014.

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

In re

RAYMOND S. ELWOOD

Debtor.

CASE NO. 13-11700 rel
Chapter 13
EX-PARTE ORDER
GRANTING RELIEF FROM
THE AUTOMATIC STAY

Per the terms of the Order Confirming Plan dated December 2, 2013, by the Hon. Robert E. Littlefield, Jr., and this Order submitted by Fein, Such & Crane, LLP, attorneys for Applicant, Santander Bank, N.A., it is now

ORDERED, that the automatic stay and co-debtor stay shall be modified to allow Applicant to foreclose on real property known as 3444 Gari Lane, Schenectady, NY 12303.

ORDERED, that the Applicant notify the trustee, Andrea E. Celli, Esq., and the debtor of surplus monies, if any, arising from said sale of the Collateral.

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